



JOSEPH BRENNER
jbrenner@grsm.com
Direct (302) 992-8951

824 N. Market Street, Suite 220
Wilmington, DE 19801
www.grsm.com

March 10, 2025

VIA CM/ECF

The Hon. Richard G. Andrews
Senior District Judge
United States District Court
for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Unit 9
Room 6325
Wilmington, DE 19801

Re: Lavi, et al v. UNRWA USA National Committee, Inc.
C.A. No. 1:24-cv-00312-RGA

Dear Judge Andrews:

The undersigned represent the Defendant, UNRWA USA National Committee, Inc. ("UNRWA USA"), in the above-captioned matter. We write in response to Plaintiffs' March 6, 2025, filing of a Notice of Supplemental Authority. D.I. 38 ("Notice"). Because the Notice violates the Local Rules of Procedure, the Court should not consider the substantive argument contained therein. Should the Court be inclined to consider such argument, UNRWA USA requests the opportunity to provide a substantive response thereto.

Pursuant to Local Rule of Procedure 7.1.2(b), upon the closing of briefing on a motion, "no additional papers shall be filed absent Court approval." D. Del. L.R. 7.1.2(b). The only exception to this rule is the submission of "subsequent authorities" to the Court. *Id.* This Court has held that inclusion of argument in the Notice of Supplemental Authority is impermissible. *See Forest Laboratories, Inc. v. Amneal Pharmaceuticals LLC*, 2015 WL 880599, *1 n. 1 (D. Del. Feb. 26, 2015) (declining to consider notices of supplemental authority containing argument). In this case, the Notice not only contains citation to a decision of the United States District Court for the Southern District of New York, but also contains substantive argument related to the decision's application to this matter. *See* D.I. 38. This is in violation of Local Rule 7.1.2(b). The Court should follow the same course as in *Forest* and disregard the substantive argument contained in the Notice. In the alternative, the Court should permit UNRWA USA the opportunity to provide a substantive response.

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Should the Court have any questions and/or concerns related to the preceding, counsel is available at the Court's convenience.

Respectfully submitted,

**GORDON REES
SCULLY MANSUKHANI, LLP**

/s/ Joseph E. Brenner

Joseph Brenner

cc All counsel of record (*via CM/ECF*)